



*Consulting Engineers  
and Scientists*

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March 9, 2009  
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: February 2009 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.5 – Validation of laboratory analyses for groundwater samples collected from piezometer OCTP5 and monitoring well NE4MW32C was completed. Investigation-derived wastes (water from well development, purging, and decontamination) were profiled and disposed off-site at the Allied Waste Blue Ridge facility.
    - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.

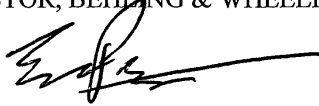
Mr. Gary Miller  
March 9, 2009  
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2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Waste profile forms/manifests for the off-site disposal of investigation-derived wastes described above are provided in Attachment A.
  - The validation report for the groundwater sample analyses described above is provided in electronic form on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation and submittal.
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLC

**ATTACHMENT A**  
**INVESTIGATION-DERIVED WASTE**  
**PROFILE FORMS/MANIFESTS**



## GENERATOR WASTE PROFILE SHEET

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Requested Disposal Facility: BLUE RIDGE  
*an Allied Waste Company*

Waste Profile #
<u>L52491613</u>
AWI Sales Rep: <u>182</u>
Date: <u>2/10/09</u>

**I. Generator Information**

Generator Name: <u>LDL COASTAL</u>			
Generator Site Address: <u>906 MARLIN</u>			
City: <u>FREEPORT</u>	County: <u>BRAZORIA</u>	State: <u>TX</u>	Zip: <u>77541</u>
State ID/Reg No: <u>N/A</u>	State Approval/Waste Code: <u>N/A</u> (if applicable)		SIC Code:
Generator Mailing Address (if different): <u>8363 WOODWAY DR STE 730</u>			
City: <u>HOUSTON</u>	County: <u>HARRIS</u>	State: <u>TX</u>	Zip: <u>77057</u>
Generator Contact Name: <u>ERIC PASTOR</u>			
Phone Number: <u>512-871-3434</u>		Fax Number:	

**IIa. Transporter Information**

Transporter Name: <u>BAYOU CITY ENV</u>		Contact Name: <u>CARL TRAGESSE</u>	
Transporter Address: <u>PO BOX 87687</u>			
City: <u>HOUSTON</u>	County:	State: <u>TX</u>	Zip: <u>77287</u>
Phone Number: <u>713-425-6624</u>	Fax Number:	State Transportation Number: <u>88133</u>	

**IIb. Billing Information**

Bill To: <u>USA Environmental, L.P.</u>		Contact Name: <u>CARL TRAGESSE</u>	
Billing Address: <u>PO Box 87687</u>			
City: <u>Houston</u>	State: <u>TX</u>	Zip: <u>77287</u>	Phone Number: <u>713-425-6624</u>

**III. Waste Stream Information**

Name of Waste: <u>NON HAZARDOUS LIQUIDS</u>	
Process Generating Waste: <u>LIQUID WAS GENERATED AT A PREVIOUS SUPERFUND SITE DURING INVESTIGATION DERIVED FROM WATER SAMPLING. THE INVESTIGATION (INSTALLATION OF MONITOR WELLS) WAS PERFORMED NEAR A FORMER MARINE SITE MAINTENANCE FACILITY.</u>	
Surface storage tanks located in the concrete berm area contained volatile organic compounds including benzene, chloroform, dichloroethane, and trichloroethylene.	
Site contaminants may include polycyclic aromatic hydrocarbons, pesticides, chlorinated hydrocarbons, and metals.	
Type of Waste	<input type="checkbox"/> INDUSTRIAL PROCESS WASTE or <input checked="" type="checkbox"/> POLLUTION CONTROL WASTE
Physical State:	<input type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER <input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> OTHER:
Method of Shipment:	<input checked="" type="checkbox"/> BULK <input type="checkbox"/> DRUM <input type="checkbox"/> BAGGED <input type="checkbox"/> OTHER: <u>VAC TRUCK</u>
Estimated Annual Volume:	<input type="checkbox"/> CUBIC YARDS: <input type="checkbox"/> TONS: <input checked="" type="checkbox"/> GALLONS <u>500</u> <input type="checkbox"/> OTHER:
Frequency:	<input checked="" type="checkbox"/> ONE TIME <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> OTHER:
Special Handling Instructions:	

**IV. Representative Sample Certification**☐ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 281.20(c) guidelines or equivalent rules?		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: <u>10/28/08</u>	Type of Sample: <input checked="" type="checkbox"/> COMPOSITE SAMPLE <input type="checkbox"/> GRAB SAMPLE	
Laboratory: <u>A&amp;B LABS</u>	Sample ID Numbers: <u>GULFCO MARINE (L)</u>	
Sampler's Employer: <u>USA ENVIRONMENT</u>		



GENERATOR WASTE PROFILE SHEET

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ALLIED WASTE  
Sampler's Name (printed): O.C. Carpenter Signature: [Handwritten Signature]  
O.C. Carpenter



## GENERATOR WASTE PROFILE SHEET (continued)

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Waste Profile #
L52Y91613

## V. Physical Characteristics of Waste

Characteristic Components	% by Weight (range)					
1. NON HAZ LIQUID -	SEE ANALYTICAL 100					
2.						
3.						
4.						
5.						
Color	Odor (describe)	Free Liquids <input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO Content 100%	% Solids	pH	Flash Point	Phenol
CLDY	NONE		0	6-8	>200 °F	N/Appm
Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) including Required Parameters Provided for this Profile						
Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvers as defined in 40 CFR 261.33?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of Polychlorinated-Biphenyls (PCBs) as defined in 40 CFR Part 761?						<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzo-dioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.51?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Toxic Material as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No
Is this waste generated at a Federal Superfund Clean Up Site?						<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No

## VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste.

Siobhan M. LeRoy	Third Party Agent for
Authorized Representative Name And Title (Printed)	Company Name LNL Coastal LP
Siobhan M. LeRoy, USA	1-19-09
Authorized Representative Signature	Date

## VII. Allied Waste Decision

<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Rejected	Expiration: 5/31/2009
Conditions: This material must be solidified immediately upon receipt at the landfill facility. Once the material is able to pass a paint filter test, it is acceptable for landfill disposal.		
Mark Phillips, Special Waste Analyst	<i>Mark Phillips</i>	2/11/2009
Name, Title	Signature	Date



33420



88153

NON-HAZARDOUS WASTE MANIFEST

1003801

Please print or type

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of 1									
3. Generator's Name and Mailing Address 906 Marlin LDC Coastal Freeport TX 77541				5. Generating Location (if different)									
4. Phone (512)-671-3434		6. Phone ( )											
7. Transporter #1 Company Name USA		8. US EPA ID Number TXR000043539		9. Transporter #1's Phone 713 425-6900									
10. Transporter #2 Company Name		11. US EPA ID Number		12. Transporter #2's Phone									
13. Designated T/S/D Facility Name and Site Address Blue Ridge LF 2200 FM 521 Fredero TX		14. US EPA ID Number		15. Facility's Phone 281-835 6142									
16. Waste Shipping Name and Description		17. Allied Waste Approval # and Exp. Date		18. Containers									
a. Non hazardous liquids		LS2491613 exp. 5/31/09		<table border="1"> <tr> <th>No.</th> <th>Type</th> <th>19. Total Quantity</th> <th>20. Unit Wt/Vol</th> </tr> <tr> <td></td> <td></td> <td>250 GAL</td> <td></td> </tr> </table>		No.	Type	19. Total Quantity	20. Unit Wt/Vol			250 GAL	
No.	Type	19. Total Quantity	20. Unit Wt/Vol										
		250 GAL											
b.													
c.													
d.													
21. Additional Descriptions for Materials Listed Above													
22. Special Handling Instructions and Additional Information USA Job# 3229-08-011 mail manifest to PO BOX 87687 Houston, TX 77287													
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.													
Printed/Typed Name Stephen LeRoy		Signature Stephen LeRoy		Month Day Year 12/17/09									
24. Transporter #1: Acknowledgement of Receipt of Materials													
Printed/Typed Name Shed Williams		Signature Shed Williams		Month Day Year 2/18/09									
25. Transporter #2: Acknowledgement of Receipt of Materials													
Printed/Typed Name		Signature		Month Day Year									
26. Discrepancy Indication Space FEB 18 2009													
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 19)													
Printed/Typed Name Shirley A. Conner		Signature Shirley A. Conner		Month Day Year 12/17/09									

GENERATOR

TRANSPORTER

T/S/D FACILITY

TRANSPORTER #1